

SEALED

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION
NO. 5:03-CV-204-BO

FILED

MAR 20 2003

DAVID W. DANIEL, CLERK
US DISTRICT COURT
BY J DEPT. CLERK

UNITED STATES OF AMERICA,

Plaintiff,

v.

NORTH CAROLINA'S ORIGINAL
COPY OF THE BILL OF RIGHTS,

Defendant.

COMPLAINT FOR FORFEITURE
IN REM

The United States of America, by and through the United States Attorney for the Eastern District of North Carolina, states as follows:

1. This is a civil action in rem brought to enforce the provision of 18 U.S.C. § 981(a)(1)(C), providing for the forfeiture of property constituting or derived from proceeds traceable to violations of 18 U.S.C. §§ 2314 and 2315.

2. This Court has jurisdiction over this matter by virtue of 28 U.S.C. §§ 1345 and 1355. Venue in this district is proper by virtue of 18 U.S.C. § 981(h) and 28 U.S.C. § 1395(b).

3. The defendant is located within the jurisdiction of this Court.

4. The facts and circumstances supporting the seizure and forfeiture of the defendant are contained in the Affidavit of Charles R. Reavis, United States Marshal, the original of which is attached to an Application and Affidavit for Seizure Warrant

filed on March 13, 2003, having the Docket Number of 5:03-M-103, and is incorporated herein by reference. (A copy is attached hereto as Exhibit A). The facts contained in the affidavit constitute probable cause for the forfeiture of the defendant.

5. The defendant is forfeitable to the United States pursuant to 18 U.S.C. § 981(a)(1)(C).

WHEREFORE, the United States of America prays that a warrant of arrest in rem issue for the arrest of the defendant; that due notice be given to all parties to appear and show cause why the forfeiture should not be decreed; that judgment be entered declaring the defendant forfeited to the United States of America for disposition according to law; and that the United States of America be granted such other relief as this Court may deem just and proper, together with the costs and disbursements of this action.

Respectfully submitted this 20th day of March, 2003.

FRANK D. WHITNEY
United States Attorney

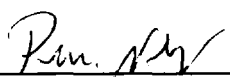
BY: Paul M. Newby
PAUL M. NEWBY
Assistant United States Attorney
Civil Division
310 New Bern Avenue
Federal Building, Suite 800
Raleigh, NC 27601-1461
Telephone: (919) 856-4530
Facsimile: (919) 856-4821

VERIFICATION

I, Paul M. Newby, Assistant United States Attorney for the Eastern District of North Carolina, declare under penalty of perjury, as provided by 28 U.S.C. Section 1746, the following:

That the foregoing Complaint for Forfeiture is based on reports and information furnished to me by Charles R. Reavis, United States Marshal, and to the best of my information and belief, is true and correct.

This the 20th day of March, 2003.



PAUL M. NEWBY
Assistant United States Attorney
Civil Division

United States District Court

EASTERN

DISTRICT OF

NORTH CAROLINA

In the Matter of the Seizure of

(Address or brief description of property or premises to be seized)

Original copy of Bill of Rights (North Carolina's copy)
and associated documents

APPLICATION AND AFFIDAVIT FOR SEIZURE WARRANT

CASE NUMBER: 5:03-M-103

Charles R. Reavis

being duly sworn depose and say:

I am a(n) United States Marshal

Official Title

and have reason to believe

that in the Eastern District of North Carolina

there is now certain property which is subject to forfeiture to the United States, namely (describe the property to be seized)

Original copy of Bill of Rights (North Carolina's copy) and associated letters and documents, including, but not limited to, two letters from George Washington to Governor Samuel Johnston, dated June 19, 1789 and October 2, 1789.
WHICH IS THE PROPERTY OF THE UNITED STATES UNDER THE UNITED STATES CODE

Stolen Goods

18 U.S.C. 981(a)(1)(C), 28 U.S.C. 2461(c) and 18 U.S.C. 982

concerning a violation of Title 23 United States Code, Section(s) 15

The facts to support a finding of Probable Cause for issuance of a Seizure Warrant are as follows:

See attached.

Continued on the attached sheet and made a part hereof.

☒ Yes ☐ No

Charles R. Reavis
Signature of Affiant

Sworn to before me, and subscribed in my presence

March 13, 2003

Date

at Raleigh, NC
City and State

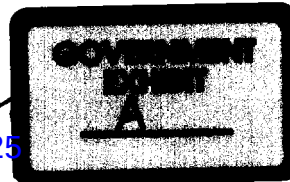
TERRENCE W. BOYLE, Chief, United States
Name and Title of Judicial Officer District Judge

Terrence Boyle
Signature of Judicial Officer

I certify the foregoing to be a true and correct
copy of the original.

David W. Davis, Clerk
United States District Court
Eastern District of North Carolina

By *David W. Davis*
Deputy Clerk



STATE OF NORTH CAROLINA
COUNTY OF WAKE

AFFIDAVIT

I, the undersigned Charles R. Reavis, United States Marshal for the Eastern District of North Carolina, make the following statements:

1. I have been in law enforcement since 1968. I have served as a deputy sheriff for about 11 years and as a special agent with the Drug Enforcement Administration until 2002. I served as the resident agent in charge of the Raleigh office from 1999 until 2002. I am currently the United States Marshal for the Eastern District of North Carolina, having been appointed in March 2002. As a seasoned law enforcement officer, I have investigated numerous crimes and am familiar with the legal standard for probable cause.

2. In this affidavit, I am relating information which has been derived from sources which I find to be reliable. The information was provided by the Offices of the Governor and the Attorney General of North Carolina.

3. This seizure involves one of the original 13 copies of the Bill of Rights and associated letters and documents that belonged to the State of North Carolina and were stolen in 1865.

4. At the time that the Bill of Rights was enacted, a copy was transmitted to each state. The copy given to North Carolina was eventually put on display in the Office of the Secretary of State from which it was stolen in 1865 and taken across state lines to one of the Northern states, believed to be Ohio. See Hendersonville, NC Newspaper article, dated May 28, 1991, attached as Exhibit A.

5. In 1925, a man by the name of Charles I. Reid, of Harrisburg, Pennsylvania, wrote a letter to a professor at the University of North Carolina, indicating that he had come into possession of North Carolina's original copy of the Bill of Rights taken from the state house in Raleigh. Thereafter, Reid attempted to broker a sale of the document back to the State of North Carolina. However, state officials indicated that they were unwilling to pay taxpayer funds for stolen property, and asserted that the document should be voluntarily returned. One state official noted that,

So long as it remains away from the official custody of North Carolina, it will serve as a memorial of individual theft. Since this fact must be clear to anyone acquainted with the history and law, not to mention honor, it is

interesting to note the present whereabouts of the document and to speculate on how long the joy of illegitimate possession can hold out against scruples arising from intelligent consideration of the facts involved.

Letter dated April 7, 1925, attached as Exhibit B, p. 1. See other correspondence attached as Exhibit B.

6. Again, in 1995, a seller, through counsel by the name of John L. Richardson, in Washington, D.C., approached officials for the State of North Carolina Department of Cultural Resources and offered to sell the document. In a letter dated October 24, 1995, Mr. Richardson wrote that the individuals seeking to sell the document "insist upon anonymity. We are warned that they are nervous and, if they believe their identity may be disclosed against their will, they may act in a manner which will not be in any of our interest." In that same letter, Mr. Richardson indicated that his clients received estimates on the valuation of the document ranging between \$3 million and \$10 million dollars. Letter dated October 24, 1995, attached as Exhibit C. Again, state officials indicated that they could not spend taxpayer funds for stolen property.

7. Recently, the governor of Pennsylvania contacted the governor of North Carolina and indicated that a Pennsylvania non-profit organization, whose aim is to preserve various antiquities, had been approached about purchasing the North Carolina original copy of the Bill of Rights. Knowing the ownership claim of North Carolina, the organization would not complete the transaction without the consent of North Carolina. The organization had agreed to purchase the North Carolina copy of the Bill of Rights for five million dollars (\$5,000,000.00).

8. It appears that the North Carolina copy of the Bill of Rights, and associated letters and documents is currently possessed and offered for sale by Wayne E. Pratt and/or his agents. On January 16, 2003, Pratt signed two agreements: one agreeing to the sale of the document for five million dollars (\$5,000,000.00) within a two month period, and the other of the same date agreeing to pay Peter Tillou and William Reese a commission of one million dollars (\$1,000,000.00) for the sale. Exhibits D and E.

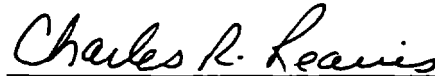
9. To facilitate the sale, Pratt, Tillou and Reese, using the art gallery of Kaller's America Gallery, Inc. provided the document with associated letters to Documentary History of the 1st Federal Congress, a department of George Washington University. Faculty of that department indicated that there were two authentic letters from George Washington to the governor of North Carolina, Samuel Johnston. The conclusion was, "the

document you are researching is without question the North Carolina copy of the Bill of Rights." Exhibit F.

10. By offering the North Carolina copy of the Bill of Rights and associated documents for sale and signing the contracts, it appears that Wayne E. Pratt and/or his associates possess the stolen document. Mr. Pratt is represented by John L. Richardson, the Washington, D.C. attorney who offered the documents for sale in 1995.

11. Accordingly, there is probable cause to believe that Wayne E. Pratt and his associates have violated 18 U.S.C. § 2315. North Carolina's original version of the Bill of Rights which was stolen in 1865 is subject to seizure for forfeiture pursuant to federal statutes (18 U.S.C. §§ 981(a)(1)(C) and 982 and 28 U.S.C. § 2461 (c)). (It will ultimately be returned to the State of North Carolina, its rightful owner).

I declare under penalty of perjury that the foregoing is true and correct. Respectfully submitted this 13th day of March, 2003.



Charles R. Reavis
United States Marshal
Eastern District of N.C.

MAY 28 91

Bill of Rights copy visits only state missing theirs.

By KIRSTEN B. MITCHELL
NTT Regional Newspapers

As Tar Heels climbed aboard the HMS Rose for a glimpse of Rhode Island's copy of the Bill of Rights, some may have wondered about North Carolina's copy of the historic document.

The HMS Rose, a 24-gun wooden frigate, visited the Port City last week as part of a 24-city East Coast tour celebrating the 200th anniversary of the ratification of the Bill of Rights.

One of 12 copies of the Bill of Rights known to exist — the Rhode Island copy — is displayed on the ship in a glass-topped wooden case that is fire-proofed and temperature- and humidity-controlled.

Of the 13 original copies of the Bill of Rights — one for each colony — North Carolina's copy is the only one missing. The state's copy disappeared in April 1865 when a soldier in General William T. Sherman's Union Army stole it from the office of the secretary of state in Raleigh, said Dr. William Price, director of the N.C. Division of Archives and History in Raleigh. A reward for its return to the state was never offered.

Price and his colleagues still wonder where North Carolina's copy is but doubt it will ever be found.

Sixty years after it was stolen, state officials had the chance to buy the state's copy of the Bill of Rights, Price said. They refused, however, on the grounds that it was stolen property.

The soldier who stole the docu-

Of the 13 original copies of the Bill of Rights — one for each colony — North Carolina's copy is the only one missing. The state's copy disappeared in April 1865 when a soldier in General William T. Sherman's Union Army stole it.

ment brought it to his home in Tipppecanoe, Ohio, where he sold it, according to a March 25, 1925, letter to R.B. House, then-secretary of the N.C. Historical Commission. No one knows how much the buyer paid for the document, Price said.

"The old gentleman who bought it off the soldier did so in the belief that that it was contraband of war, which may have been the case at that time," wrote Charles I. Reid, a New York City man representing the document's possessor. The man who bought the document from the Union soldier wished to sell North Carolina its copy of the Bill of Rights.

Two years after the document was stolen, the N.C. secretary of state and the treasurer journeyed to Indianapolis to get the document but were convinced by the possessor and Indiana's secretary of state that they could not obtain it, Reid's letter to House says. No other mention is made of how Indiana became involved in the mystery; speculation

is that the person who bought the document from the soldier lived in Indiana.

"The possessor is a very old man and had treasured this manuscript for the past 59 years," the letter says. "I believe the need of money has prompted him to offer it for sale." Reid's letter indicates that the document's possessor would consider "reasonable honorarium" for the document. No price is men-

tioned in the letter.

"He has certainly preserved the document well and it would return home in about the same condition in which it left," Reid said.

In a response to Reid's letter, House wrote April 7, 1925, that the document "though clearly the property of the State of North Carolina, is not important enough to engage in controversy over."

"So long as it remains away from the official custody of North Carolina, it will serve as a memorial of individual theft," continued House. Later, he wrote, "It is interesting to speculate on how long the joy of illegitimate possession can hold out against scruples arising from the intelligent consideration of the facts involved."

Sixty-six years later, the document's possessor, perhaps an heir of the person who bought the document from Gen. Sherman's soldier, is still holding out.

April 7th, 1925.

Mr. Charles I. Reid,
767 St. Nicholas Avenue,
New York, N. Y.

Dear Sir:

I acknowledge your letter of March 25th. The document you are attempting to sell, though clearly the property of the State of North Carolina, is not important enough to engage in controversy over. So long as it remains away from the official custody of North Carolina, it will serve as a memorial of individual theft. Since this fact must be clear to anyone acquainted with history and law, not to mention honor, it is interesting to note the present whereabouts of the document and to speculate on how long the joy of illegitimate possession can hold out against scruples arising from intelligent consideration of the facts involved.

Very truly yours,

Secretary.

CHARLES I. REID
LECTURE AND CONCERT TOURS
167 ST. NICHOLAS AVENUE
NEW YORK

March 25, 1925.

Mr. R. B. House, Secretary,
The North Carolina Historical Commission,
Raleigh, North Carolina.

Dear Sir:

Many thanks for your letter of March 24.

The original copy of the bill of rights as submitted to the state of North Carolina was taken, according to my information, from the office of the secretary of state at Raleigh by a soldier of Sherman's army, who carried it home with him to Tippecanoe, Ohio and there sold it to the present possessor in 1866.

I do not know, after the opinion you have given, whether any private title could exist. The old gentleman who bought it of the soldier did so in the belief that it was contraband of war, which may have been the case at that time. About two years afterwards the secretary of state and treasurer of the state of North Carolina journeyed to Indianapolis to obtain possession of the document but were convinced by the possessor and the secretary of state of Indiana that they could not obtain it.

The possessor is a very old man and has treasured this manuscript for the past 59 years. I believe a need of money has prompted him to offer it for sale. In view of the fact that, as you say, it has a sentimental value, aside from any personal value he may attach to it, only in the state of North Carolina and is a public document, I believe he would be disposed to consider and accept any reasonable honorarium for any equity, real or imaginary, he may have in it, and I would so recommend to him. He has certainly preserved the document well and it would return home in about the same condition in which it left.

Very truly yours,

Charles I. Reid

March 24th, 1925.

Mr. Charles I. Reid,
767 St. Nicholas Avenue,
New York, N. Y.

Dear Sir: ---

A letter written by you on March 16th to General Julian S. Carr, of Durham, has been referred to me by the private secretary of General Carr's estate. It appears that you are seeking a purchaser of the original of the bill of rights as submitted to the State of North Carolina. I, of course, do not know the history of this document since its disappearance from North Carolina, but it was stolen from the State Capital in 1865 and therefore the title to it has never passed from the State of North Carolina to any individual. I rely upon your interpretation of these circumstances to take what action you think right in the matter. I am sure, however, that no person in the State of North Carolina would be willing to purchase the documents under such conditions, and thus give commercial standing to such an act as its being taken under the circumstances attending its disappearance. The document, of course, is entirely of sentimental value, as part of the original records of the State.

Very truly yours,

March 1935, 1935.

Mr. Chas. L. Rein,
767 St. Nicholas Ave.,
New York, N. Y.

My Dear Sir:-

Your letter of the 15th addressed to
the late Gen. J. S. Carr, and placed in my post
office box.

Gen. Carr died April 25th, 1934.

I have referred your letter to

Col. Fred A. Olsen,
State Historical Society,
Baltimore, Md. C.

and he may write you.

Yours very truly,

Chas. L. Rein
Private Secy., Late Gen. J. S. Carr.



Julian S. Carr;
SOUTHERN SECURITIES-
AND INVESTMENTS-
Durham, N.C.

March 19th, 1925.

My Dear Friend:-

The enclosed letter and my reply,
I refer to you, and if y u see fit, you can write
the party.

It appears to me that the document re-
ferred to ought to be, by rights, returned to the
State Archives, at this time, without any reward, but
but, there are folks and folks.

Yours very truly,

Thos. M. Gorman

To
Col. Fred A. Olds,
Raleigh, N. C.

CHARLES I. REID
LECTURE AND CONCERT TOURS
167 ST. NICHOLAS AVENUE
NEW YORK

March 16, 1925.

Julian S. Carr, Esq.,
Durham, N.C.

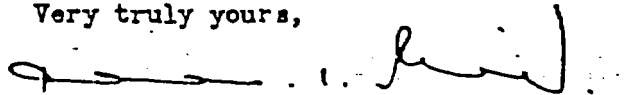
Dear Sir:

The present owner of the document described in the enclosed sheets, known as the Bill of Rights of the People, bearing the first ten amendments to the constitution of the United States as transmitted by the first congress of the United States to the state of North Carolina, has commissioned the writer to find a purchaser for it.

This parchment has, so far as I know, never before been available for purchase and has been in the possession of the present owner since 1866.

It is thought that you might be interested in a first opportunity to obtain this most important of historical documents, for your private collection or for presentation to the state of North Carolina. I am prepared to obtain prompt consideration of an offer.

Very truly yours,



Feb. 9, 1925.

My dear Mr. Reid:

The only accounts of any length concerning the entrance of the Union troops into the city of Raleigh in 1865 are to be found in Mrs. Spencer's "Last Ninety Days of the War in North Carolina", (now out of print and very difficult to be obtained), and a much briefer account in my "Reconstruction in North Carolina."

You are mistaken as to the sacking of the city. The State House was pretty thoroughly runnaged over and looted to some extent, but there was a notable absence of that sort of thing in the case of the city.

Might I suggest that since the document in your possession is the property of the State of North Carolina, and so judged in a recent case by the Supreme Court of the United States, that it would be a very graceful and appreciated act on your part to follow the example of numerous other persons in the North, into whose possession documents with a similar history have come, ~~and~~ restore it to the State of North Carolina? Mr. R. B. House, North Carolina Historical Commission, Raleigh, N.C., is officially empowered to receive such documents. I can assure you that such action will be highly appreciated in the State.

Very truly yours,

J. C. deRoulhac Hamilton.

Mr. Charles I. Reid,
Harrisburg, Pa.

THE UNIVERSITY OF NORTH CAROLINA
CHAPEL HILL

DEPARTMENT OF HISTORY AND GOVERNMENT

Feb. 9, 1925.

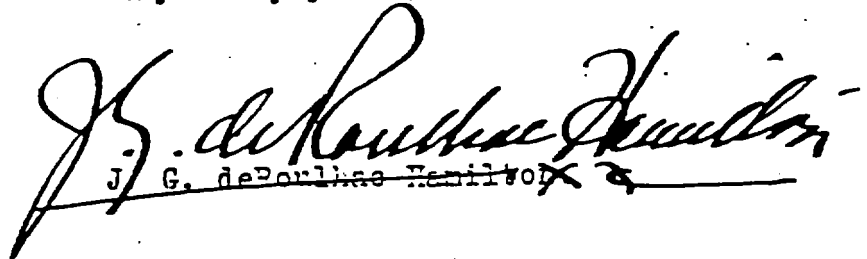
Dear House:

Enclosed is a copy of a letter received by me, and also a copy of my reply, sent for your information.

It would not be worth suing the man, and there are some objections to making an official claim to it, but at the same time, I hate for these damned rascals to get away with it. You can take such action as you think wise.

With best wishes,

Very truly yours,


J. G. deBorlhae Hamilton

T.

February 13th, 1925.

Dr. J. G. deR. Hamilton,
Chapel Hill, N. C.

Dear Dr. Hamilton:

I have received your letter and a copy of the letter written by you on February 9th to Mr. Charles I. Reid of Harrisburg, Pa.

I think you have made clear to him what he ought to do in the matter of returning the manuscripts to the State of North Carolina, and I think it would be wise to give him a little time to do the right thing, if he wants to. I am glad that you called my attention to the matter.

I will have a check for you within a few days.

Very truly yours,

Secretary.

COPY.

REID EDITORIAL SERVICE
Harrisburg, Pennsylvania

February 6, 1925.

Prof. J. D. De Rouillac Hamilton,
University of North Carolina,
Chapel Hill, North Carolina.

Dear Sir:

The writer has attempted to find, in your History of North Carolina, detailed information about the incidents connected with the entrance of the Union Army into the city of Raleigh, the sacking of the city and the state house.

I have recently come into possession of the original copy of the first thirteen amendments to the Constitution of the United States given to the state of North Carolina as one of the thirteen states by the first Congress which met at New York in 1789. This document was taken from the state house at Raleigh by one of the Union soldiers who came from Ohio. I am greatly interested in obtaining any details of the events surrounding the incident. Any suggestion would be greatly appreciated.

Very truly yours,

(Signed) Chas. I. Reid.

INFORMATION CONCERNING THE DOCUMENT HAVING INSCRIBED
UPON IT THE FIRST TEN AMENDMENTS TO THE CONSTITUTION
OF THE UNITED STATES, POPULARLY KNOWN AS THE BILL OF
RIGHTS OF THE PEOPLE, TRANSMITTED TO THE STATE OF
NORTH CAROLINA BY THE FIRST CONGRESS OF THE UNITED
STATES OF AMERICA WHICH MET IN NEW YORK CITY IN 1789

This historical document, bearing the signatures of John Adams, Vice President of the United States and President of the Senate, Frederick Augustus Muhlenberg, Speaker of the House of Representatives and Sam. A. Otis, Secretary of the Senate, was taken from a vault in the office of the Secretary of State of North Carolina by a soldier of Sherman's Army on the march from Georgia to the sea. This soldier was one of a company who went through the state house, helping themselves to whatever they found. The soldier took the document home with him to Tippecanoe, Ohio.

The document has been kept with very little exposure to the light and is still in splendid condition. It is a remarkable piece of penmanship and every line of it is almost as legible as when first written.

VEDDER, PRICE, KAUFMAN, KAMMHOLZ & DAY

A PARTNERSHIP INCLUDING VEDDER, PRICE, KAUFMAN & KAMMHOLZ

2121 K STREET, N.W.

7TH FLOOR

WASHINGTON, D.C. 20037

202/496-1200

FACSIMILE: 202/496-1212

JOHN L. RICHARDSON
202/496-1224

October 24, 1995

VEDDER, PRICE, KAUFMAN & KAMMHOLZ

321 NORTH LA SALLE STREET
CHICAGO, ILLINOIS 60601-1003

415 LONGWOOD STREET
ROCKFORD, ILLINOIS 61101-4264
312/792-7100

VEDDER, PRICE, KAUFMAN, KAMMHOLZ & D

103 THIRD AVENUE
NEW YORK, NEW YORK 10022-3203
212/407-7700

CONFIDENTIAL - VIA FACSIMILE

The Honorable Betty McCain
Secretary of Cultural Resources
State of North Carolina
109 East Jones Street
Raleigh, North Carolina 27601-2807

Dear Ms. McCain:

It was good to talk with you last week. I look forward to a mutually satisfactory arrangement which will bring us all to a very positive result.

At the outset, please let me emphasize again how important it is that we proceed quickly and with maximum confidentiality. As I told you, I have no direct relationship with the people who have the article, and there are at least three intermediaries between me and those people. Given this separation, some obvious problems arise. While we can develop an appropriate process to overcome most of them, others will persist. Most prominently, we are constantly encouraged to "move faster," and we are reminded that the people who have the article have alternatives available to them. Unfortunately, we have no way of knowing how much of this is posturing and how much is real. We have also been told repeatedly that the people insist upon anonymity. We are warned that they are nervous and, if they believe their identity may be disclosed against their will, they may act in a manner which will not be in any of our interests. Again, we have no idea about the extent to which any of these warnings should be taken seriously but, to the extent we can maintain a high level of confidentiality and expedite the process, we can minimize any potential adverse impact.

With the need for secrecy and expedition clearly understood, we propose a transaction under which the two sides will agree to convey the article to a party you would identify for an amount equal to the article's appraised value. To complete such a transaction, the article must be authenticated; its value must be determined; the purchase funds must be raised; and the operative documents must be agreed upon. Once we agree on the basics of the transaction, all four of these activities can and should proceed at the same time.

The Honorable Betty McCain
October 24, 1995
Page 2

Although we are confident about the authenticity of the article, we know that you will need independent assurances in this regard. We propose that you identify a person or a group, independent of the State of North Carolina, who would serve as your authenticator. Assuming that person is acceptable to our side, we would make the article available for inspection under appropriately controlled conditions. ?

We would propose to complete the valuation process in a similar fashion. Both sides would agree upon five independent appraisers and ask each of them to appraise the article independently. We would strike the highest and lowest appraisals and consummate the transaction on the basis of the average of the remaining three. The experts would be instructed that their appraisal would not be effected by questions of ownership, but it would consider the condition of the article.

It seems to us that a necessary part of the valuation process would involve the establishment of both a floor and a ceiling on the purchase price. If the appraisers indicate that the value was below a certain amount, our people reasonably would not go forward. Similarly, we assume that if the appraisal resulted in a valuation over a certain amount, you would not be able or willing to proceed. As discussed last week, at this point, you should proceed on the assumption that the article will be valued at an amount in excess of \$3 million. We have received estimates ranging up to \$10 million, and we are not aware of any under \$3 million.

Although the fund-raising process is certainly your responsibility, we would strongly recommend that we agree on some system where the transaction can be consummated without waiting for the completion of a major fund-raising campaign. To assure maximum confidentiality and expedition, it would be best if one qualified person or small group of people would agree to fund or underwrite the transaction. It would not be reasonable to expect the people who now have the article to wait while a broad-based fund-raising effort is publicized and completed.

We are still developing our thoughts with respect to the actual transfer transaction. Since our client does not have the article, it views itself as a facilitator in this process. Nevertheless, under appropriate circumstances, it might be able to be a "seller" to whatever "purchaser" you determine appropriate. You may be more concerned than we about the actual form of transaction we choose, but certainly with respect to representations, warranties, indemnification and confidentiality, a sales transaction would appear to be the best form to follow.

The Honorable Betty McCain
October 24, 1995
Page 3

Please consider all this and let me have your thoughts. As indicated above, we continue to hear stories of impatience and threats of pursuing alternative courses of action attributed to the present possessors of the article. We believe it is important to proceed as fast as possible, and we assure you we are prepared to move forward at whatever pace you find appropriate.

I look forward to hearing from you.

Best regards,



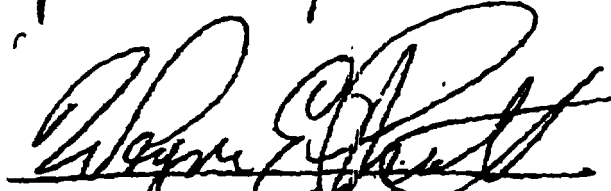
John L. Richardson

January 16, 2003

Peter Tillman and William Reese
have a two-month option to

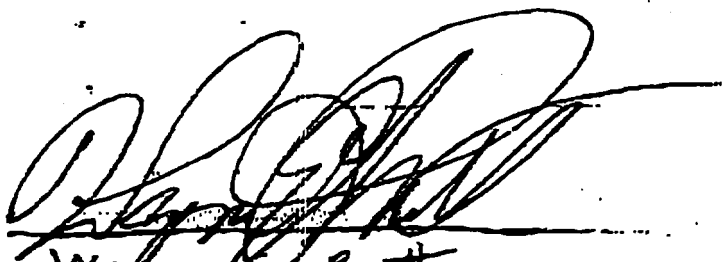
sell the Bill of Rights, at a

price agreed to by me, Wayne E. Pratt
at five million dollar


Wayne E. Pratt

January 16, 2003

Peter Tillon and William Reese
will receive a net commission of
\$ 1 million from the sale of the
Bill of Rights when sold for
\$ 5 million.



Wayne G. Pratt

DOCUMENTARY HISTORY of the 1ST FEDERAL CONGRESS

The George Washington University, Washington, D.C. 20052

(202) 676-6777

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Charlene N. Bickford

CO-EDITOR:

Kenneth R. Bowling

ASSOCIATE EDITOR:

Helen E. Veit

ASSOCIATE EDITOR:

William C. diGiacomantonio

12 February 2003

Mr. Seth Kaller
Kaller's America Gallery, Inc.
44 Wall Street
Suite 1237
New York, New York 10005



Dear Mr. Kaller,

Enclosed please find the dockets from two letters from George Washington to Samuel Johnston [Governor of North Carolina]. They are dated 19 June and 2 October 1789. These dockets were included among the sample dockets that you provided to the Constitution Center, though as you know neither is specifically identified. The one dated 2 October is on the verso of the letter in which Washington enclosed North Carolina's copy of the Bill of Rights.

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As you will see, the docketing on the two letters noted above is the same handwriting (and format) as the docketing on the verso of the Bill of Rights manuscript. Look in particular at the "7" in 1789, the final "s", and the word "the" with the high "h" and the crossed line running through the letters "th". Consequently the document you are researching is without question the North Carolina copy of the Bill of Rights.



Sincerely yours,

Kenneth R. Bowling
Kenneth R. Bowling

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